

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT**

<b>GARRET SITTS, et al.,</b>  <b>Plaintiffs,</b>  <b>v.</b>  <b>DAIRY FARMERS OF AMERICA, INC. and</b> <b>DAIRY MARKETING SERVICES, LLC,</b>  <b>Defendants.</b>	<b>Civil Action No. 2:16-cv-00287-cr</b>
---	--

**DECLARATION OF ALFRED C. PFEIFFER JR.**

I, Alfred C. Pfeiffer Jr., do declare and state as follows:

1. I am a partner with the law firm of Latham & Watkins LLP, which has been retained by Dairy Farmers of America, Inc. and Dairy Marketing Services, LLC (collectively “DFA”) in connection with this Action. I submit this declaration in support of DFA’s concurrently filed Opposition to Plaintiffs’ Motion *in Limine* to Exclude Deposition Designations of Midland Farms, Inc. and Cloverland Farms Dairy.

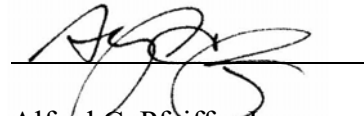
2. Pursuant to the Court’s Orders, ECF Nos. 66, 85, the Protective Order in this case and addendum thereto, ECF Nos. 45, 68, exhibits attached hereto are being filed under seal.

3. Attached as Exhibit 1 is a true and accurate excerpt of the Transcript of the February 28, 2011 Deposition of James A. Cella, *Allen v. Dairy Farmers of America, Inc.*, No. 5:09-cv-00230-cr (D. Vt.).

4. Attached as Exhibit 2 is a true and accurate excerpt of the Transcript of the March 9, 2011 Deposition of Demetrios E. Haseotes, *Allen v. Dairy Farmers of America, Inc.*, No. 5:09-cv-00230-cr (D. Vt.).

I declare under penalty of perjury under the laws of the United States that the foregoing  
is true and correct.

Dated: July 1, 2020

A handwritten signature in black ink, appearing to read 'A. Pfeiffer', is written over a horizontal line.

Alfred C. Pfeiffer Jr.  
of LATHAM & WATKINS LLP

**CERTIFICATE OF SERVICE**

I hereby certify that on July 1, 2020, I electronically filed with the Clerk of Court the foregoing document using the CM/ECF system and served the below parties via email. The CM/ECF system will provide service of such filing via Notice of Electronic Filing (NEF) to the NEF parties:

Joel G. Beckman, Esq. (jbeckman@nbparis.com)  
Gary L. Franklin, Esq. (gfranklin@primmer.com)  
William C. Nystrom, Esq. (wnystrom@nbparis.com)  
Elizabeth A. Reidy, Esq. (ereidy@nbparis.com)  
Dana A. Zakarian, Esq. (dzakarian@nbparis.com)

Dated: July 1, 2020

/s/ Alfred C. Pfeiffer Jr.  
Alfred C. Pfeiffer Jr. (admitted *pro hac vice*)  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
Telephone: 415-391-0600  
Facsimile: 415-395-8095  
Email: al.pfeiffer@lw.com